



opposition, Plaintiff's Reply (if any), and available dates for the show cause hearing, within five (5) business days of service on Defendants.

2. The parties are directed to inform the Court in the same joint filing their positions on if this case should remain under seal.
3. The TROs shall remain in effect until Plaintiff's motions for a preliminary injunction and attachment are resolved on the merits.

**SO ORDERED:**

Dated: New York, New York  
14 May 2021

  
Victor Marrero  
U.S.D.J.



Epstein Drangel LLP  
60 East 42nd Street, Suite 2520, New York, NY 10165  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

May 13, 2021

**VIA E-MAIL**

Hon. Victor Marrero  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Moonbug Entertainment Limited v. a20688, et al.*, Case No. 21-cv-4313  
*Moonbug Entertainment Limited v. 13071860213, et al.*, Case No. 21-cv-4315  
*Moonbug Entertainment Limited v. AICHENG, et al.*, Case No. 21-cv-4317  
Request to Modify TROs**

Dear Judge Marrero,

We represent Plaintiff Moonbug Entertainment Limited (“Plaintiff”), in the above-referenced related matters (the “Actions”).<sup>1</sup> On May 13, 2021, Plaintiff filed the Actions and its Applications under seal. On the same day, May 13, 2021, the Court granted Plaintiff’s Applications and entered the Temporary Restraining Orders (“TROs”). Plaintiff respectfully requests modification of Section II(B) of the TROs, specifically the briefing schedules and date of the show cause hearing for a preliminary injunction order.

As the TROs currently stand, the Defendants’ deadline to file an opposition is Tuesday, May 18, 2021. This timeline allows for two (2) business days for the Third Party Service Providers DHgate, Wish and Amazon to comply with the expedited discovery ordered in the TROs, specifically providing Defendants’ email addresses in order for Plaintiff to effect service of the Summons, Complaint and TROs on Defendants prior to May 18, 2021. It typically takes the Third Party Service Providers a minimum of five (5) business days to comply. Therefore, Plaintiff respectfully requests modification of Section II(B) of the TROs to allow for additional time to serve Defendants and for Defendants to file an opposition. Should the Court modify the briefing schedule in Section II(B) of the TROs, Plaintiff respectfully requests the Court adjourn the show cause hearing on Plaintiff’s applications for a preliminary injunction order to a later date.

We thank the Court for its time and attention to this matter.

---

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaints or Applications.

Hon. Victor Marrero  
May 13, 2021  
Page 2

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Yamali  
Danielle S. Yamali (DY 4228)  
dfutterman@ipcounselors.com  
60 East 42nd Street, Suite 2520  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiff*